

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE:

BRUNO PALIOTTA
ANNA PALIOTTA
Debtor

BK No.: 07-11894
Chapter 13

MOTION FOR RELIEF FROM AUTOMATIC STAY

GRP Loan, LLC (together with its predecessors, successors, affiliates, principals, and assigns, “Lender”) hereby moves this Court for an Order granting relief from the automatic stay provisions pursuant to 11 U.S.C. §362(d)(1) and/or 11 U.S.C. §362(d)(2) and granting relief from the stay imposed by Federal Rule of Bankruptcy Procedure 4001(a)(3). Lender respectfully requests that it be granted relief so as to exercise its non-bankruptcy rights and remedies including, without limitation, (1) taking possession of the property located at 105 Princess Avenue, Cranston, Rhode Island (the “Property”), (2) foreclosing its mortgage thereon or obtaining a deed-in-lieu of foreclosure, (3) seeking to obtain, if necessary, eviction of the Debtors and any occupant from the Property, and (4) any other relief this Court deems just and proper.

The bases of the within Motion are set forth in the Memorandum filed herewith which is incorporated herein by reference.

GRP LOAN, LLC
By Its Attorneys,

/s/ Thomas E. Carlotto
Thomas E. Carlotto #6088
SHECHTMAN HALPERIN SAVAGE, LLP
1080 Main Street
Pawtucket, RI 02860
(401) 272-1400 phone
(401) 272-1403 fax

Dated: December 3, 2007

Within ten (10) days after service as evidenced by the certification and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Bankruptcy Court Clerk's Office, 380 Westminster Mall, 6th Floor, Providence, Rhode Island 02903 (401) 528-4477. If no objection or other response is timely filed within the time allowed herein, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATION OF SERVICE

The undersigned hereby certifies that copies of the Motion for Relief from Automatic Stay, Memorandum in Support, and proposed Order have been served upon the following parties via electronic notice or via first class mail postage prepaid, as indicated, this 11th day of December, 2007:

Via Electronic Notice:

Office of the U.S. Trustee
10 Dorrance Street
Providence, RI 02903

John Boyajian, Esq. Trustee
Boyajian Harrington & Richardson
182 Waterman Street
Providence, RI 02906

Christopher Bjesse, Esq.
50 Power Road, Suite 200
Pawtucket, RI 02860
Debtors' counsel

Via First Class Mail:

City of Cranston
Tax Collector
869 Park Avenue
Cranston, RI 02910

Bruno Paliotta
105 Princess Avenue
Cranston, RI 02920
Debtor

Anna Paliotta
105 Princess Avenue
Cranston, RI 02920
Debtor

Giuseppe Paliotta
105 Princess Avenue
Cranston, RI 02910
Co-Debtor

/s/ Thomas E. Carlotto